

RECEIVED FEB 24 2012 *fd*

February 23, 2012

Deena Sheppard, Enforcement Specialist
U.S. Environmental Protection Agency – Region 5
Superfund Division SE-5J
77 West Jackson Boulevard
Chicago, IL 60604-3590

US EPA RECORDS CENTER REGION 5



Subject: Gary Development Landfill Site 104(e) Information Request

Dear Ms. Sheppard:

I am writing on behalf of DPH Holdings Corp. (a/k/a Old Delphi) in response to the CERCLA Section 104(e) information request which we received on December 23, 2011 for the above-referenced site. We received an extension until February 23, 2012 to respond to that request.

During the relevant time period that the Gary Development Landfill Site was in operation (1975 to 1989), Delco Electronics Corp. was a wholly-owned subsidiary of General Motors Corporation ("GM") and Delphi was a division of GM. On January 1, 1999 the former Delphi division of GM became a stand-alone company (Old Delphi). Delco Electronics became a subsidiary of Old Delphi at the time of the January 1, 1999 spin-off from GM. Delco Electronics was then merged into Old Delphi on September 30, 2005. Old Delphi filed for bankruptcy on October 5, 2005, and through a series of name changes Old Delphi became DPH Holdings Corp ("DPH"). New Delphi emerged from bankruptcy on October 6, 2009 and at that time the former Delco Electronics Plant Bypass facility in Kokomo, Indiana was transferred from DPH to GM Components Holdings LLC ("GMCH") which still owns the facility. As part of that transaction, GMCH retained a number of former DPH employees as well as files relating to the former Delco Electronics operations in Kokomo.

A copy of DPH's response to the 104(e) information request is enclosed. If you should have any questions, please do not hesitate to contact me.

Sincerely,

William R. Schikora
As Agent for DPH Holdings Corp.
(248) 813-1475 (Direct)

cc: John Brooks

Enclosures

DPH Holdings Corp.

World Headquarters 5725 Delphi Drive Troy, MI 48098 USA

1. The only document in the possession of DPH Holding Corp. ("DPH") that is responsive to this question is the October 14, 1996 Gary Development Company, Inc. Landfill summary report prepared by the Indiana Department of Environmental Management (the "IDEM Report") which was provided to DPH by U.S. EPA. Page 18 of the IDEM Report alleges that the Delco Electronics facility in Kokomo, Indiana disposed of a methanol and water mixture at an incinerator in Northern Indiana. There is no suggestion that waste was sent to the Gary Development Landfill Site (the "Site"), and DPH has not identified any other information indicating that material was sent to the Site. Relevant pages from the IDEM Report are enclosed.

2. a) Not applicable. DPH has not identified any information indicating that it sent materials to the Site.

b) Not applicable. DPH has not identified any information indicating that it sent materials to the Site.

c) Not applicable. DPH has not identified any information indicating that it sent materials to the Site.

d) Not applicable. DPH has not identified any information indicating that it sent materials to the Site.

e) Not applicable. DPH has not identified any information indicating that it sent materials to the Site.

f) Not applicable. DPH has not identified any information indicating that it sent materials to the Site.

g) Not applicable. DPH has not identified any information indicating that it sent materials to the Site.

h) Not applicable. DPH has not identified any information indicating that it sent materials to the Site.

i) Not applicable. DPH has not identified any information indicating that it sent materials to the Site.

j) Not applicable. DPH has not identified any information indicating that it sent materials to the Site.

k) Not applicable. DPH has not identified any information indicating that it sent materials to the Site.

l) Not applicable. DPH has not identified any information indicating that it sent materials to the Site.

m) Not applicable. DPH has not identified any information indicating that it sent materials to the Site.

n) Not applicable. DPH has not identified any information indicating that it sent materials to the Site.

o) Not applicable. DPH has not identified any information indicating that it sent materials to the Site.

p) Not applicable. DPH has not identified any information indicating that it sent materials to the Site.

q) Not applicable. DPH has not identified any information indicating that it sent materials to the Site.

r) Not applicable. DPH has not identified any information indicating that it sent materials to the Site.

s) Not applicable. DPH has not identified any information indicating that it sent materials to the Site.

t) Not applicable. DPH has not identified any information indicating that it sent materials to the Site.

u) Not applicable. DPH has not identified any information indicating that it sent materials to the Site.

v) Not applicable. DPH has not identified any information indicating that it sent materials to the Site.

w) Not applicable. DPH has not identified any information indicating that it sent materials to the Site.

x) Not applicable. DPH has not identified any information indicating that it sent materials to the Site.

y) Not applicable. DPH has not identified any information indicating that it sent materials to the Site.

z) Not applicable. DPH has not identified any information indicating that it sent materials to the Site.

3. Jeff Blankenberger. Jeff is a former DPH employee who is now an employee of GM Components Holdings LLC ("GMCH") which is the entity that currently owns

the former Delco Electronics facility in Kokomo, Indiana. Mr. Blankenberger's phone number is 765-451-6738 and he is located at the GMCH Kokomo facility.

Dale Beal. Dale is a former DPH employee who is now an employee of GMCH which is the entity that currently owns the former Delco Electronics facility in Kokomo, Indiana. Mr. Beal's phone number is 765-451-6737 and he is located at the GMCH Kokomo facility.

4. Not applicable. DPH has not identified any information indicating that it sent materials to the Site.

5. To the knowledge of DPH, the U.S. EPA ID Numbers for the Delco Electronics facilities in Kokomo were: IND 006 068 050, IND 000 806 844, and IND 000 806 851.

6. DPH has identified numerous hazardous waste manifests associated with the Delco Electronics facilities in Kokomo. None of those waste manifests indicates that wastes were sent to the Site. DPH is in the process of reviewing and copying those waste manifests and will provide them to U.S. EPA. On information and belief, copies of waste manifests may have remained at the Plant Bypass facility when that facility was sold to GMCH in October 2009.

7. To the knowledge of DPH, all of Delco Electronics' hazardous wastes were transported to permitted sites using licensed carriers.

8. To the knowledge of DPH, the U.S. EPA ID Number for the Delco Electronics facilities in Kokomo were: IND 006 068 050, IND 000 806 844, and IND 000 806 851.

9. To the knowledge of DPH, the U.S. EPA ID Number for the Delco Electronics facilities in Kokomo were: IND 006 068 050, IND 000 806 844, and IND 000 806 851.

10. DPH has not identified any information responsive to this request.

11. Delco Electronics had two facilities in Kokomo, Indiana: Plant 1 and Plant Bypass.

Delco Electronics - Plant 1 had been demolished. The address of that facility was:

700 E. Firmin Street
Kokomo, IN 46902

Delco Electronics – Plant Bypass is currently owned by GMCH. The address of that facility is:

General Motors Components Holdings
2100 E. Lincoln Road
Kokomo, IN 46902

12. DPH has not identified any schematic diagrams or flow charts regarding the Delco Electronics operations in Kokomo, Indiana.

13. Operations at the Delco Electronics – Plant 1 facility included production of radios (1936-1998), carburetors (1938-1941), military electronics (1941-1945), and automotive electronics (1945-1998). Manufacturing operations at Plant 1 ceased in 1998 and the plant was subsequently demolished.

Operations at the Delco Electronics – Bypass Plant included semiconductor manufacturing which began in approximately 1961, crystal-growing operations which began in approximately 1975, and radio and circuit board manufacturing which began in approximately 1977. The Bypass Plant was sold to GMCH in 2009.

DPH had a Technology Center located at the corner of Lincoln and Goyer Roads in Kokomo. The Technology Center primarily housed offices for engineering and administrative support. The Technology Center was transferred to New Delphi in October 2009.

14. DPH has not identified any information responsive to this request regarding the Delco Electronics operations in Kokomo, Indiana.

15. DPH has not identified any information responsive to this request. On information and belief, copies of MSDSs may have remained at the Plant Bypass facility when that facility was transferred by DPH to GMCH in October 2009.

16. DPH has not identified any information responsive to this request. On information and belief, copies of release reports may have remained at the Plant Bypass facility when that facility was transferred by DPH to GMCH in October 2009.

17. DPH has not identified any information responsive to this request. On information and belief, copies of federal filings for hazardous wastes may have remained at the Plant Bypass facility when that facility was transferred by DPH to GMCH in October 2009.

18. DPH has not identified any information responsive to this request.

19. DPH has identified Biennial Waste Reports submitted to IDEM for the years 1991 and 1995. Copies of those reports are being copied and will be provided to U.S. EPA. On information and belief, copies of Indiana State filings for hazardous wastes

may have remained at the Plant Bypass facility when that facility was transferred by DPH to GMCH in October 2009.

20. DPH has identified Biennial Waste Reports submitted to IDEM for the years 1991 and 1995. Copies of those reports are being copied and will be provided to U.S. EPA.

21. DPH has not identified any information responsive to this request. On information and belief, copies of any TSCA, EPCRA, and Clean Water Act filings (if any) may have remained at the Plant Bypass facility when that facility was transferred by DPH to GMCH in October 2009.

22. DPH has not identified any information responsive to this request.

23. DPH has identified numerous waste characterization reports associated with the Delco Electronics facilities in Kokomo, although there is no indication that any of the waste was sent to the Site. DPH is in the process of copying those waste characterization reports and will provide them to U.S. EPA.

24. DPH has not identified any information responsive to this request.

25. DPH has not identified any information responsive to this request.

26. DPH has not identified any information responsive to this request. DPH does not have insurance relating to the Site.

27. DPH has not identified any information responsive to this request. DPH does not have insurance relating to the Site.

28. DPH has not identified any information responsive to this request. DPH does not have insurance relating to the Site.

29. Not applicable. DPH does not have insurance relating to the Site.

30. Not applicable. DPH does not have insurance relating to the Site.

31. Not applicable. DPH does not have insurance relating to the Site.

32. Not applicable. DPH does not have insurance relating to the Site.

33. Not applicable. DPH does not have insurance relating to the Site.

34. Not applicable. DPH does not have insurance relating to the Site.

35. Not applicable. DPH does not have insurance relating to the Site.

36. DPH permanently retains waste manifests, summaries of waste characterization data, waste analyses, and waste generation reports.

I have reviewed the above response and certify that the information contained therein is true and accurate to the best of my knowledge and belief.

Don Sokol

Don Sokol
As Agent for
DPH Holdings Corp.

SIGNED IN MY PRESENCE: Barbara Burin Steel
Notary Public in the County of Oakland,
State of Michigan

this 23rd of February, 2012

BARBARA BURINSTEEL
NOTARY PUBLIC, STATE OF MI
COUNTY OF OAKLAND
MY COMMISSION EXPIRES Dec 15, 2016
ACTING IN COUNTY OF OAKLAND

GARY DEVELOPMENT COMPANY, INC. LANDFILL
479 North Cline Avenue
P.O. Box 6056
Gary, Indiana 46406
EPA LD. No. IND 077 005 916
Solid Waste Construction Permit No. SW-133
Solid Waste Operating Permit No. 45-2

initiated by
Matthew T. Klein
Hazardous Waste Section
Office of Enforcement
Indiana Department of Environmental Management
October 14, 1996

Enforcement Sensitive
Attorney-Client Work Product
Not For Public View

March 9, 1977

A letter was issued to Mr. Hagen from Mr. Dove regarding the disposal of terminal treatment plant sludge from U.S. Steel. The letter granted interim approval for disposal of the terminal treatment plant sludge at the GDC Landfill until ISBH could complete an analysis of the chemical content of the waste. The letter noted that the waste should be mixed with the general refuse and covered daily.

March 11, 1977

A letter was issued to Messrs. Baker and Hunt from Mr. William C. Child, Northern Region Manager, Land Field Operations Section, Division of Land/Noise Pollution Control, Illinois Environmental Protection Agency, regarding the alleged disposal of various wastes at the GDC Landfill that had originated in Illinois.

The list attached to the letter noted various facilities that had generated and transported wastes to the GDC Landfill. The generators included:

1. Dreeblan Paint Company (paint washings)
2. Baron-Blakeslee Company (still bottoms)
3. Howell Company (nickel cleaner)
4. Hills McCanna Company (soluble oils)
5. Benjamin Moore & Company (wash thinners)
6. National Precision Circuits (CuNH₄ Persulfate)
7. Ansul Corporation (phenolic waste)
8. National Can Company (oil and water wastes)
9. Western Electric-Hawthorne Works (wire mill wastes)
10. Staley Chemical Company (industrial sludge)
11. H.P. Smith Paper Company (drum sludge)
12. Spot Nails (caustic sludge)
13. Union Special Corporation (soluble oils)
14. Allis-Chalmers (chrome sludge)
15. Delco Electronics (methanol and water)
16. Danly Machine Corporation (oil and waste water)

[Ansul Corporation is located in Marinette, Wisconsin and the disposal site was listed as "unknown." National Can Company is located in LaPorte, Indiana as the disposal site was listed as "various locations." The H.P. Smith Paper Company disposal site was listed as Midwest Solvent Recycling Corporation (MIDCO). Allis-Chalmers is located in LaPorte, Indiana. Delco Electronics is located in Kokomo, Indiana and the disposal site was listed as "incinerator in Northern Indiana."]

The transporters of waste to the GDC Landfill included:



For FedEx Express® Shipments Only

Page 1 of 1

Insert
airbill
here
▼

Extreme

From: (248) 813-1474
Bill Schikora
DELPHI CORPORATION
5725 DELPHI DR
MC 483 400 575
TROY, MI 48098

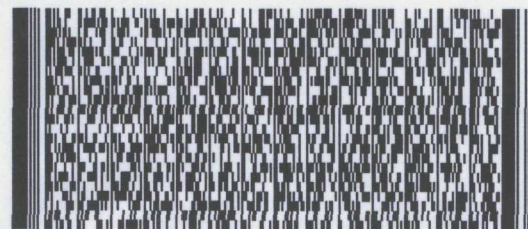
Origin ID: MTCA



J12101112190225

SHIP TO: (312) 886-7048
Deena Sheppard
U.S. EPA - Region 5
77 W JACKSON BLVD
SUPERFUND DIVISION SE-5J
CHICAGO, IL 60604

BILL SENDER



Ship Date: 23FEB12
ActWgt: 1.0 LB
CAD: 101990890/INET3250

Delivery Address Bar Code



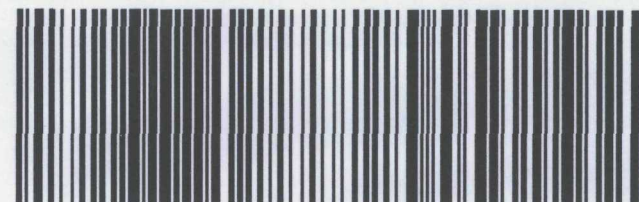
Ref # DPH
Invoice #
PO #
Dept #

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PRIORITY OVERNIGHT

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